

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

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Docket No. MC98-1

PITNEY BOWES INTERROGATORIES  
TO USPS WITNESS PLUNKETT  
(PB/USPS-T5-5-6)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,

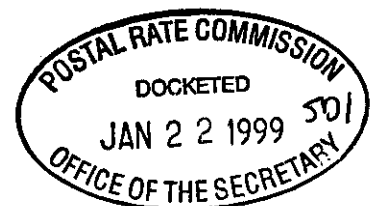


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DC1:87650



- PB/USPS-T5-5 Please confirm that both pages 1 and 2 to the attachment of Witness Plunkett's revised response to OCA/USPS-T-10 exclude inserter costs of the sort reported by Mr. Seckar in his calculations of incremental costs (see Worksheet 3 of the most recent calculation) and one-time information systems costs. Why were these costs excluded?
- PB/USPS-T5-6 Do you recommend that the .1 cent per impression fee called for in proposed fee schedule 981 found at Attachment B2, page 1 of the Postal Service Request should be increased to .21 cents? If not, why not?

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: January 22 1998

Ian Doherty  
Ian D. Volner